

1 UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK⁹⁶

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4 THE FOOTBALL ASSOCIATION)
5 PREMIER LEAGUE LIMITED AND)
6 BOURNE CO., ET AL., ON BEHALF)
7 OF THEMSELVES AND ALL OTHERS)
8 SIMILARLY SITUATED,,)

Figueira Decl. Tab

96

9 PLAINTIFFS,)

10 vs.)

07 CIV. 3582 (LLS)

11 YOUTUBE, INC., YOUTUBE, LLC)
12 AND GOOGLE, INC.,,)

13 DEFENDANTS.)

14 VIACOM INTERNATIONAL INC.,)
15 COMEDY PARTNERS, COUNTRY MUSIC)
16 TELEVISION, INC., PARAMOUNT)
17 PICTURES CORPORATION, AND)
18 BLACK ENTERTAINMENT)
19 TELEVISION, LLC,)

PLAINTIFFS,)

vs.)

07 CIV. 2103 (LLS)

YOUTUBE, INC., YOUTUBE, LLC)
AND GOOGLE, INC.,,)

DEFENDANTS.)

VIDEOTAPED DEPOSITION OF JIM PATTERSON

FRIDAY, DECEMBER 18, 2009

SAN FRANCISCO, CALIFORNIA

Job No. 18411

1 syndicated the YouTube service to mobile carriers, 96-0002
2 we also made the YouTube service available through
3 the devices on which -- the consumer electronic
4 devices on which those were available, even if we
5 didn't have a contractual relationship with them.

6 9:20 Q. Okay. I think I asked the question wrong.
7 As you point out, handset devices are consumer
8 electronic devices too. What I'm asking about are
9 consumer electronic devices that hook up to
10 televisions?

11 9:21 A. Okay.

12 9:21 Q. Do you have a term that you want to use to
13 describe those to make sure that we're using the
14 same language?

15 9:21 A. Devices that connect to televisions.

16 9:21 Q. Okay.

17 9:21 A. Yeah.

18 9:21 Q. When did YouTube first begin syndicating
19 content to partners in the devices that connect to
20 televisions space?

21 9:21 A. So in the most liberal interpretation,
22 which would be a PC that can connect to a
23 television, it would be when we started allowing
24 YouTube videos to be embedded in other websites.

25 9:21 Q. Okay.

1 9:21 A. Or actually even just when we launched the
2 YouTube service 'cause you can connect to a PC that
3 has a browser.

4 9:21 Q. If we exclude PCs from the equation --

5 9:21 A. Okay.

6 9:21 Q. -- and we are talking about things like
7 set top boxes and gaming consoles and devices of
8 that category. When did YouTube begin syndicating
9 content to partners in that space?

10 9:22 A. I believe the first partnership of that
11 sort was also with Apple, and it was around Apple
12 TV, and it may have been the exact same agreement
13 that -- through which we made YouTube service
14 available on the iPhone.

15 9:22 Q. And --

16 9:22 A. Which was before I joined Google, so it
17 was a few years ago.

18 9:22 Q. Do you know whether that was in 2006 or
19 2007?

20 9:22 A. I don't know for sure. If it was in 2007,
21 then it was in very early 2007.

22 9:22 Q. And who were the early partners in that
23 line of business?

24 9:22 A. So Apple was the earliest by a lot. And
25 then the next set of companies I think of in that